

Roderick & Solange  
**MacArthur  
 Justice  
 Center**

Roderick and Solange MacArthur Justice Center  
 160 East Grand Avenue, Sixth Floor  
 Chicago, Illinois 60611  
 O 312 503 0012  
 F 312 503 0891  
 C 203 214 0195  
 macarthurjustice.org

**Jonathan Manes**  
 Attorney at Law  
 Bar Admission: New York State  
 jonathan.manes@law.northwestern.edu

January 9, 2021

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #: \_\_\_\_\_  
 DATE FILED: 1/11/2021

BY ECF

The Honorable Alison J. Nathan  
 United States District Judge  
 Thurgood Marshall United States Courthouse  
 40 Foley Square, Room 2102  
 New York, NY 10007

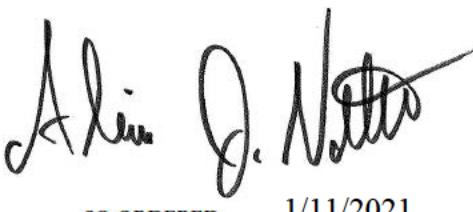
RE: *Innocence Project v. National Museum of Health and Medicine*, No. 19-cv-1574  
 Letter motion to accept late-filed status report

Dear Judge Nathan,

Plaintiff submits this letter motion to ask the Court to accept the late-filed joint status report it submitted earlier today. *See* ECF No. 75. The status report was due yesterday, Friday, January 8, 2021, per the Court's order endorsing the parties' previous status report. ECF No. 74. The parties' failure to timely file the report was entirely the fault of undersigned counsel. Undersigned counsel circulated a draft of the joint status report to Defendant's counsel on Thursday, January 7, 2021, and promptly received consent to file from Defendant's counsel's that evening. However, in the midst of other professional obligations on Friday, undersigned counsel failed to file the status report as required. Counsel realized the oversight earlier today when reviewing open matters and then immediately filed the report.

Plaintiff respectfully asks the Court to accept the late-filed status report. Undersigned counsel apologizes to the Court and requests its forbearance for this lapse.

The request for an extension of time to file the status report nunc pro tunc is GRANTED. The parties shall file a further status report on or before April 9, 2021. SO ORDERED.



SO ORDERED. 1/11/2021  
 ALISON J. NATHAN, U.S.D.J.

Respectfully submitted,

/s/**Jonathan Manes**  
 Jonathan Manes  
 Roderick & Solange MacArthur Justice  
 Center  
 160 E. Grand Ave., 6th Fl.  
 Chicago, IL 60611  
 (312) 503-0012  
 jonathan.manes@law.northwestern.edu

*Counsel for Plaintiff*